

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

JODI C. MAHDAVI,

Plaintiff

v.

NEXTGEAR CAPITAL, INC.

Case No. 1:14-cv-0648- TCB

and

P.A.R. SERVICES, INC.,

Defendants.

MOTION TO WITHDRAW AS COUNSEL
AND MEMORANDUM IN SUPPORT THEREOF

COMES NOW, Jonathan E. Levine, Esquire, Counsel for the Plaintiff, Jodi C. Mahdavi (“Mrs. Mahdavi”), pursuant to Local Rule 83.1(G) and Va. R. Prof. Conduct 1.16, for his motion to withdrawal as counsel of record for Mrs. Mahdavi, and in support thereof respectfully states as follows:

1. The undersigned seeks leave to withdraw as counsel because of Mrs. Mahdavi’s failure to substantially fulfill the obligations of her agreement for legal services with the undersigned and his law firm, Levine, Daniels & Allnutt, PLLC, despite reasonable warning to fulfill her obligations.
2. Additionally, continued representation will result in an unreasonable financial burden on the undersigned.
3. Furthermore, the undersigned’s withdrawal can be accomplished without material adverse effect on Mrs. Mahdavi because there is adequate time to prepare for and secure

replacement counsel for the next steps in the case, which includes a motion for summary judgment hearing on March 20, 2015 and the trial which is set for April 28, 2015.

WHEREFORE, based on the foregoing, Jonathan E. Levine, Esquire, respectfully requests an order permitting him to withdraw as counsel of record for Mrs. Mahdavi.

Dated: January 28, 2015

Respectfully submitted,

Jonathan E. Levine, Esquire
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By /s/ Jonathan E. Levine
Jonathan E. Levine, Esquire
VA Bar ID 45572
Counsel for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of January, 2015, a true and correct copy of the foregoing Motion to Withdraw As Counsel and Memorandum in Support Thereof was delivered to the following via CM/ECF: James Bragdon, Esquire, GALLAGHER, EVELIUS & JONES, LLP, 218 N. Charles Street, Suite 400, Baltimore, Maryland 21201, *Co-Counsel for Defendant, NextGear Capital, Inc.*; Ashley W. Winsky, Esquire, MCGUIREWOODS, LLP, 310 Fourth Street, N.E., Suite 300, Charlottesville, Virginia 22902, *Co-Counsel for Defendant, NextGear Capital, Inc.*; and James N. Markels, JACKSON & CAMPBELL, P.C., 1120 20th Street, N.W., South Tower, Third Floor, Washington, D.C. 20036, *Counsel for Defendant, P.A.R. Services, Inc.*, and to Jodi C. Mahdavi via electronic mail and certified mail (# 7010 3090 0002 9279 0894) at her last known address of 915 Fairway Drive, Vienna, Virginia 22180.

By /s/ Jonathan E. Levine
Jonathan E. Levine, Esquire